

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

Steven C. Kirven, Master-In-Equity

Appellate Case No.: 2017-000886

RECEIVED

MAY 26 2017

SC Court of Appeals

Federal National Mortgage Association.....Respondent,

v.

John D. Dalen, Julie A. Dalen and Wawtockace Hills Property Owners
Association.....Defendants,

Of whom

John D. Dalen and Julie A. Dalen, are.....Appellants.

v.

Bank of America, N.A. successor by merger to BAC Home Loans Servicing, L.P. f/k/a
Countrywide Home Loans Servicing, L.P.....Respondent.

**RESPONDENT FEDERAL NATIONAL MORTGAGE ASSOCIATION'S
MOTION FOR EXTENSION OF TIME**

Respondent Federal National Mortgage Association hereby moves for an extension of time to file and serve its Initial Brief of Respondent Federal National Mortgage Association and Respondent Federal National Mortgage Association's Designation of Matter to Be Included in the Record on Appeal due to counsel's heavy



workload. The present deadline for service and filing of its Initial Brief and Designation of Matter to Be Included in the Record on Appeal is June 14, 2017.

Respondent's counsel requests a 30 day extension. Respondent's counsel believes that there is good cause to grant the requested extension to July 14, 2017.

WHEREFORE, Respondent Federal National Mortgage Association prays for an Order extending the time in which to serve and file its Initial Brief of Respondent Federal National Mortgage Association and Respondent Federal National Mortgage Association's Designation of Matter to Be Included in the Record on Appeal for an additional thirty days, to July 14, 2017.

Respectfully submitted,



Charles S. Gwynne Jr. (SC Bar # 73844)

Rogers Townsend & Thomas, PC

Post Office Box 100200 (29202)

1221 Main Street 14th Floor

Columbia, South Carolina 29201

(803) 771-7900

charlie.gwynne@rtt-law.com

Attorney for the Respondent Federal

National Mortgage Association

Rogers Townsend & Thomas, PC and its staff are debt collectors

May 26, 2017

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Bank of America, N.A. successor by merger to BAC Home Loans Servicing, L.P. f/k/a
Countrywide Home Loans Servicing, L.P.....Respondent.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the **RESPONDENT FEDERAL NATIONAL MORTGAGE ASSOCIATION'S MOTION FOR EXTENSION OF TIME** on Appellants and other Respondent by depositing copies of it in the United States Mail, postage prepaid, on May 26, 2017, at the addresses shown on the attachment listing Other Parties and Counsel of Record.



Charles S. Gwynne Jr. (SC Bar # 73844)
Rogers Townsend & Thomas, PC
Post Office Box 100200 (29202)
1221 Main Street 14th Floor
Columbia, South Carolina 29201
(803) 771-7900
charlie.gwynne@rtt-law.com
Attorney for the Respondent Federal
National Mortgage Association
Rogers Townsend & Thomas, PC and its staff are debt collectors

Other Parties and Counsel of Record:

John D. Dalen
109 Wood Valley Drive
Westminster, SC 29693
Pro Se Appellant

Julie A. Dalen
109 Wood Valley Drive
Westminster, SC 29693
Pro Se Appellant

Brian A. Calub, Esquire
McGuire Woods LLP
201 North Tryon Street, Suite 3000
Charlotte, NC 28202-2146
Attorney for Respondent Bank of America, N.A. successor by merger to BAC Home
Loans Servicing, L.P. f/k/a Countrywide Home Loans Servicing, L.P

ROGERS TOWNSEND & THOMAS, PC
POST OFFICE BOX 100200 (29202)
1221 MAIN STREET 14TH FLOOR
COLUMBIA, SOUTH CAROLINA 29201
P 803.771.7900 F 803.343.7017
W RTT-LAW.COM

CHARLES S. GWYNNE JR.
SHAREHOLDER
CHARLIE.GWYNNE@RTT-LAW.COM
P 803.744.1933
F 803.343.7017

LICENSED IN SOUTH CAROLINA



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SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

RE: Federal National Mortgage Association v. John D. Dalen, Julie A. Dalen and Wawtockace Hills Property Owners Association and John D. Dalen and Julie A. Dalen Bank of America, N.A. successor by merger to BAC Home Loans Servicing, L.P. f/k/a Countrywide Home Loans Servicing, L.P.,
Our file: 515262.1894
Appellate Case No. 2017-000886

Dear Ms. Kitchings:

Enclosed are the original and seven (7) copies of Respondent Federal National Mortgage Association's Motion for Extension of Time, along with a Proof of Service. Please return a filed copy of the document to me. Also included is my firm's check for \$25 representing the filing fee.

By copy of this letter, I am serving a copy of the Respondent Federal National Mortgage Association's Motion for Extension of Time and Proof of Service on all parties to this appeal.

Thank you for your assistance in this matter.

With kind personal regards, I am

Sincerely yours,

A handwritten signature in black ink, appearing to read "Charles S. Gwynne Jr.", written over a horizontal line.

Charles S. Gwynne Jr.

/ow
Enclosures as stated

cc:

John D. Dalen
109 Wood Valley Drive
Westminster, SC 29693

Julie A. Dalen
109 Wood Valley Drive
Westminster, SC 29693

Brian A. Calub, Esquire
McGuire Woods LLP
201 North Tryon Street, Suite 3000
Charlotte, NC 28202-2146